

**quinn emanuel trial lawyers | new york**

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

December 20, 2021

**VIA ECF**

The Honorable Jennifer P. Wilson  
United States District Court  
Middle District of Pennsylvania  
228 Walnut Street,  
P.O. Box 983  
Harrisburg, PA 17108

Re: P. H. Glatfelter Company v. Babcock & Wilcox Power Generation Group, INC., No. 19-  
cv-2215-JPW-MCC

Dear Judge Wilson,

I write on behalf of Defendant Babcock & Wilcox with regard to the status conference currently scheduled for December 22, 2021, at 10 a.m. (Dkt. 52). Plaintiff's counsel is aware of this letter and does not oppose its contents.

Given the timing of the conference a couple of days before Christmas, we thought it best to inform Your Honor that the parties have been working under Magistrate Judge Carlson's supervision on a number of discovery disputes. On December 15, 2021, the parties and Judge Carlson had a conference call about a new discovery dispute, as well as the need for a modest extension to the current case management orders (Dkts. 28, 52). Judge Carlson ordered the parties to meet and confer and report back to him, and he set a status conference in his chambers for December 30, 2021, if needed, to resolve any remaining discovery disputes. He also ordered the parties to submit a proposed revised schedule by January 15, 2021.

In light of these developments, we wanted to give you this brief update, in the event that you may find it preferable to postpone the currently scheduled status conference while the parties work with Judge Carlson to resolve their disputes and propose a revised schedule to bring discovery in this case to a close. We are, of course, prepared for and available for the December 22, 2021, conference but thought it best to at least let you know about this in advance so that you can decide whether you wish to go forward with the conference now or postpone it.

**quinn emanuel urquhart & sullivan, llp**

ATLANTA | AUSTIN | BOSTON | BRUSSELS | CHICAGO | HAMBURG | HONG KONG | HOUSTON | LONDON | LOS ANGELES | MANNHEIM | MIAMI |  
MUNICH | NEUILLY-LA DEFENSE | NEW YORK | PARIS | PERTH | SALT LAKE CITY | SAN FRANCISCO | SEATTLE | SHANGHAI | SILICON VALLEY |  
STUTTGART | SYDNEY | TOKYO | WASHINGTON, DC | ZURICH

Should the decision be to go forward as scheduled, we provide the following conference line information:

Dial (267) 831-0333

Enter Passcode 895-3680-3663#

When asked for Participant ID, just press #.

Respectfully,

*/s/ Jonathan Feder*

R. Brian Timmons, Esq.

Rollo C. Baker, Esq.

Brian Campbell, Esq.

Jonathan E. Feder, Esq.

Evan Forbes, Esq.

QUINN EMANUEL URQUHART

& SULLIVAN, LLP

51 Madison Avenue, 22<sup>nd</sup> Floor

New York, NY 10010

Telephone: (212) 849 7000

Facsimile: (212) 849-7100

briantimmons@quinnemanuel.com

rollobaker@quinnemanuel.com

briancampbell@quinnemanuel.com

jonathanfeder@quinnemanuel.com

evanforbes@quinnemanuel.com

Bridget E. Montgomery, Esquire (PA ID 56105)

ECKERT SEAMANS CHERIN &

MELLOTT, LLC

213 Market Street, 8<sup>th</sup> Floor

Harrisburg, PA 17101

Telephone: 717.237.6054

Facsimile: 717.237.6019

Email: [bmontgomery@eckertseamans.com](mailto:bmontgomery@eckertseamans.com)

*Attorneys for Defendants*